

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA)	
)	
)	
v.)	CIVIL ACTION NO.
)	
PUERTO RICO AQUEDUCT AND)	
SEWER AUTHORITY)	
)	
and)	
)	
THE COMMONWEALTH OF)	
PUERTO RICO,)	
)	
Defendants.)	

COMPLAINT

1. The United States of America, by the authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency (“EPA”), files this Complaint and alleges as follows:

NATURE OF ACTION

2. This is a civil action seeking injunctive relief and the assessment of civil penalties against the Puerto Rico Aqueduct and Sewer Authority (“PRASA”) for violations of the Clean Water Act, 33 U.S.C. §1251, *et seq.* (the “CWA”). Specifically, PRASA violated the CWA by discharging pollutants in violation of Section 301(a) of the Act, 33 U.S.C. §1311(a), and/or failing to comply with the terms of National Pollutant Discharge Elimination System (“NPDES”)

permits issued to it by EPA pursuant to Section 402 of the Act, 33 U.S.C. §1342. Additionally, PRASA has failed to report unauthorized discharges as required by its NPDES permits.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the parties and the subject matter of this action under 28 U.S.C. §§ 1331, 1345, and 1355, Section 1414(b) and (g)(3)(c) of the SDWA, 42 U.S.C. §§ 300g-3(b) and (g)(3)(c), and Section 309(b) of the CWA, 33 U.S.C. § 1319(b). This Court has personal jurisdiction over both the Commonwealth of Puerto Rico and PRASA, because PRASA is a government agency or commission established by the Commonwealth of Puerto Rico.

4. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c) and 1395(a), SDWA Section 1414(g)(3)(c), 42 U.S.C. § 300g-3(b)(3)(c), and CWA Section 309(b), 33 U.S.C. §§ 1319(b), and because the defendants are located in this district and the events or omissions giving rise to this action occurred in this district.

PARTIES

5. Plaintiff is the United of America, acting by the authority of the Attorney General and on behalf of the Administrator of the EPA.

6. Defendant PRASA is a public corporation and an autonomous governmental instrumentality of the Commonwealth of Puerto Rico, organized and existing under the Laws of Puerto Rico, P.R. Ann., title XXII, §144 (1983), and is a “municipality” within the meaning of Section 502(4) of the CWA, 33 U.S.C. §1362(4). The purpose of PRASA is to own, operate, and develop all public water supply and wastewater facilities in Puerto Rico.

7. The Commonwealth is defined as a “State” pursuant to Section 502(3) of the CWA, 33 U.S.C. §1362(3), and is joined as a defendant solely with respect to the violations of

the Clean Water Act alleged in this action pursuant to Section 309(e) of the Act, 33 U.S.C. §1319(e). Notice of the commencement of this action has been provided to the Commonwealth of Puerto Rico pursuant to Section 309(a) of the Act, 33 U.S.C. §1319(a).

8. At all times relevant to this Complaint, PRASA has owned and/or operated, and continues to own and operate, the water treatment plants (WTPs), wastewater treatment plants (WWTPs) and pump stations at which the CWA violations alleged in this Complaint occurred and continue to occur.

STATUTORY AND REGULATORY BACKGROUND

The Clean Water Act

9. Section 301(a) of the CWA, 33 U.S.C. §1311(a), prohibits the discharge of any pollutants by any person except in compliance with the requirements of that section and as authorized by, and in compliance with, a NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. §1342.

10. Section 502(5) of the CWA, 33 U.S.C. § 1362(5), defines “person” to include a state, municipality, commission, or political division of a state.

11. Section 502(12) of the Act, 33 U.S.C. § 1362(12), defines the term “discharge of a pollutant” as [a]ny addition of any pollutant to navigable waters from any point source”

12. Section 502(6) of the Act, 33 U.S.C. § 1362(6), defines the term “pollutant” to include sewage, biological materials, and municipal waste discharged into water.

13. Section 502(7) of the Act, 33 U.S.C. § 1362(7), defines the term “navigable waters” as the waters of the United States, including its territorial seas.

14. “Waters of the United States” has been further defined to include, *inter alia*, “[a]ll waters which are currently used, were used in the past, or may be susceptible to use in interstate

or foreign commerce, including all waters which are subject to the ebb and flow of the tide,” and tributaries to such waters. 40 C.F.R. § 122.2.

15. Section 502(14) of the CWA, 33 U.S.C. § 1362(14), defines the term “point source” as “any discernible, confined, and discrete conveyance, including, but not limited to, any pipes, ditch, channel, tunnel, conduit, well, [or] discrete fissure . . . from which pollutants are or may be discharged.”

16. Section 402(a) of the CWA, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue a NPDES permit that authorizes the discharge of pollutants into waters of the United States, provided that all discharges meet the applicable requirements of Section 301 of the Act, 33 U.S.C. § 1311, or such other conditions as the Administrator determines are necessary to carry out the provisions of the Act. Typically such permits include effluent limitations, as well as monitoring, and reporting, as well as operating, and maintenance requirements.

17. Section 402(a)(2) of the CWA, 33 U.S.C. § 1342(a)(2), provides that EPA “shall prescribe conditions for such permits to assure compliance with the requirements [of Section 402(a)(1)], including conditions on data and information collection, reporting, and such other requirements as [EPA] deems appropriate.”

18. Pursuant to 40 C.F.R. § 122.41(e), a standard condition in all NPDES permits, including each NPDES permit governing each facility at which a violation is alleged herein, states that the permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit.

19. Section 402(i) of the Act, 33 U.S.C. § 1342(i), states that nothing in Section 402 of the Act shall limit the authority of EPA to take enforcement action pursuant to Section 309 of the Act, 33 U.S.C. § 1319.

20. Section 402(k) of the Act, 33 U.S.C. § 1342(k), provides that compliance with a Section 402 permit shall be deemed compliance with Section 301 for the purposes of satisfying Section 309 of the Act.

21. Section 309 (b) and (d) of the Act, 33 U.S.C. §§ 1319 (b) and (d), authorizes the Administrator to commence a civil action for injunctive relief and for civil penalties for each violation of Section 301 of the Act, 33 U.S.C. § 1311, or any permit condition or limitation contained in a permit issued under Section 402 of the Act, 33 U.S.C. § 1342. In any such action, the Court pursuant to the CWA and the Debt Collection Improvement Act of 1996, may impose civil penalties up to \$37,500 per day for each violation of the CWA occurring after January 12, 2009.

GENERAL ALLEGATIONS UNDER THE CWA

22. PRASA is a “person” within the meaning of the Section 502(5) of the Act, 33 U.S.C. § 1362(5).

23. PRASA currently owns and/or operates at least 119 WTPs and 52 WWTPs throughout the Commonwealth of Puerto Rico. The WTPs are listed on Appendix A and the WWTPs are listed on Appendix B to this Complaint, which are incorporated herein by reference.

24. Sewage is generated in Puerto Rico as a result of domestic, commercial, governmental and industrial activities. Sanitary pipelines carry the sewage that flows by gravity to different pump stations.

25. The 52 WWTPs receive sewage water from various locations along collection systems that PRASA owns and/or operates.

26. At the WWTPs, sewage is treated through different processes, and after treatment wastewater is discharged into waters of the United States.

27. PRASA owns and/or operates approximately 768 wastewater pump stations throughout Puerto Rico. A list of the wastewater pump stations is attached to the Complaint as Appendix C. At these pump stations sewage is collected and periodically pumped out to the WWTPs.

28. The vast majority of PRASA's WTPs and all of PRASA's WWTPs operate pursuant to a NPDES permit issued by EPA under authority of Section 402(a) of the Act, 33 U.S.C. § 1342(a), and the terms of such Permits were, and are, in full force and effect during the relevant time period of the violations alleged herein. The few WTPs that do not have a current NPDES permit have completed applications pending.

29. PRASA was and is the named permittee during the relevant time period for each of the NPDES Permits authorizing discharges from the WTPs and WWTPs identified in Appendices A and B attached to this Complaint.

30. Each of the NPDES Permits issued to PRASA by EPA sets effluent limitations, establishes proper operation and maintenance requirements and prescribes discharge outfall locations, for each of the permitted WTPs and WWTPs identified in Appendices A and B to this Complaint.

31. On days that more than one of the effluent limitations contained in a NPDES permit was exceeded, each violation of each effluent limitation constitutes a separate violation of the Permit.

32. The Puerto Nuevo Regional Wastewater Treatment Plant (“RWWTP”) Wastewater Collection System (“WWCS”) includes hundreds of miles of public sewer pipe, and sixty-eight (68) sanitary pump stations that discharge pursuant to a NPDES Permit (Permit Number PR002155). The sewers associated with the Puerto Nuevo RWWTP serve over 1.2 million people located in the Municipality of San Juan and parts of the municipalities of Trujillo, Alto, Guaynabo, Bayamón and Carolina.

33. The Puerto Nuevo RWWTP NPDES Permit was issued on May 5, 2008 (Permit No. PR0021555).

34. The wastewater collection system (“WWCS”) associated with the Puerto Nuevo RWWTP was not designed as a combined sewer system (“CSS”); however, since certain portions of the WWCS were operating as a CSS with sewage flow not receiving treatment at the Puerto Nuevo WWTP and no way to easily separate the storm and sewer systems in these areas of the WWCS, PRASA applied for a permit in March 2010 indicating that seven CSO points exist in the San Juan Metropolitan area.

35. The Puerto Nuevo RWWTP Permit was reissued on September 28, 2011. The permit identified seven CSO points, and became effective on December 1, 2011. The Puerto Nuevo RWWTP Permit was modified in 2012 and 2014, and added four additional CSO points to reflect new information provided by PRASA for a total of eleven CSO points.

36. The eleven CSO points in the Permit include the following outfalls and locations: 002 at the Mercantil Plaza Building; 003 at the Barriada Figueroa (intersection of San Ramón and Del Carmen Street); 004 at the Puerto de San Juan; 005 at the Paseo la Princesa Pier; 006 at the Miramar (behind Cortés Industrial); 007 at the Plaza Las Américas, 008 at the Constitution Bridge; 009 on Pavia Street; 010 on Del Parque Street; 011 on Bolivar Street and 012 on La

Puntilla Street. These eleven CSO outfalls discharge into the Martín Peña Channel, San Juan Bay, or the Puerto Nuevo River.

37. The Puerto Nuevo RWWTP WWCS currently operates as both a CSS and a separate sewer system (“SSS”).

38. The current Puerto Nuevo RWWTP Permit allows PRASA’s Puerto Nuevo RWWTP and the eleven identified CSO points to discharge pollutants from a specified point source to the waters of the United States subject to certain limitations and conditions as set forth in the Permit.

39. EPA conducted numerous compliance inspections of portions of the Puerto Nuevo RWWTP’s WWCS over the last several years, and found numerous examples of improper operation and maintenance of the WWCS, as well as discharges of pollutants to waters of the United States not authorized by a permit. A few of the inspections are discussed below.

40. During an October 29, 2010, EPA inspection of the Villa Kennedy Building Complex, which is serviced by the Puerto Nuevo RWWTP WWCS, EPA observed overflows from a wastewater manhole reaching an earthen dike that discharged into the Los Corozos Lagoon.

41. EPA also observed during this October 29, 2010, inspection illegal interconnections at PRASA’s WWCS. Several buildings in the Villa Kennedy Building Complex were found to be discharging wastewater directly into the storm water collection channels to avoid wastewater backups inside the residential buildings.

42. EPA conducted another inspection of the Villa Kennedy Building Complex on March 30, 2011, and identified significant quantities of wastewater flowing into the backyard of Building #23 of the complex.

43. On September 5, 2012, EPA conducted an inspection of the storm sewer system and WCCS at the Barrio Obrero area in San Juan, Puerto Rico. During this inspection, EPA observed wastewater discharging into the stormwater collection system and subsequently into the Martín Peña Channel. EPA also observed a broken and overflowing PRASA sanitary manhole structure at the intersection of Brazil Street and Avenue A.

44. On April 16, 2014, EPA conducted an inspection of the wastewater collection system at Buen Consejo Community in San Juan, Puerto Rico. The inspection was in response to a citizen complaint.

45. During the inspection on April 16, 2014, EPA observed a discharge of a significant amount of wastewater from a PRASA sanitary manhole at a residential unit on Buen Consejo Final Street directly into the Juan Méndez Creek.

46. On April 16, 2014, EPA also observed signs of recent wastewater overflows near the San Agustín Residential Development at Street 6 Final near residential unit # 301 and Buen Consejo residential unit #270. EPA observed that the stormwater catch basin was impacted by an accumulation of wastewater related solids.

47. During the above referenced inspection, wastewater discharges were observed reaching the Juan Méndez Creek which connects to the Los Corozos Lagoon, a tributary to the Atlantic Ocean.

48. On July 16, 2014, EPA conducted an inspection of the WWCS at the Villa Kennedy Residential Development to identify sources of pollution affecting the Los Corozos Lagoon.

49. During the July 16, 2014 inspection, EPA observed the following: an overflowing wastewater manhole at the sidewalk of Blanca Rexach Street (near residence #353); an

overflowing wastewater service connection servicing Building #20; several wastewater manholes with high levels of wastewater and solids accumulation at buildings #22-24; a discharge pipe located in front of Building #4 and apartment #55 with sewage flowing into the stormwater collection system; an overflowing wastewater service connection and a wastewater manhole full of solids located near a baseball park; and wastewater and a stormwater manhole adjacent to a basketball court with a significant amount of flow with wastewater characteristics discharging to an open channel and subsequently into the Los Corozos Lagoon.

50. On August 21, 2014, EPA conducted an inspection of the wastewater and stormwater collection systems at Roosevelt Residential Development in San Juan, Puerto Rico. The inspection was performed as a follow-up to a random inspection conducted on June 9, 2014 where several non-compliance items were identified.

51. During the August 21, 2014 inspection, EPA observed the following: a stormwater manhole at Rodrigo de Triana and Octavio Marciano intersection with a significant amount of dry weather flow with wastewater characteristics; wastewater manholes at Fernando Calder Street with grease and other solids accumulated on the bottom of these manholes; and the wastewater manhole at Fernando Calder and Ismael Colón Street intersection flowing with difficulties and with sewage accumulation on its bottom.

52. On September 26 and 29, 2014, EPA conducted inspections of the WWCS at Bahía Residential Development's Sur and Oeste Streets intersection in Cataño, Puerto Rico. The inspections were performed to follow-up on previous wastewater overflow issues.

53. EPA observed the following at the Bahía Residential Development: wastewater overflow in front of residential unit #114 at the intersection of Sur and Oeste streets and wastewater overflows from two PRASA wastewater manholes.

54. The resident at unit #114 had connected several PVC pipes to convey the wastewater overflowing from wastewater service connection directly to the street curb to prevent wastewater discharges inside the residence.

55. The wastewater observed during the September 26 and 29, 2014 inspection of the Bahía Residential Development Wastewater Collection System reaches an earthen channel that flows to the Malaria Channel, which is a tributary to the San Juan Bay.

56. On October 2, 2014, EPA conducted an inspection of the wastewater and stormwater collection systems near the Bahía Residential Development in San Juan, Puerto Rico.

57. During the October 2, 2014 inspection, EPA observed the following: a significant amount of wastewater accumulation at the end of Oeste Cementerio Street and in front of San Martín de Porres Sanctuary; the wastewater manhole at the intersection of Oeste Cementerio and Canal Este Streets full of sewage and discharging sewage into the street and in the direction of the earthen channel leading to the Malaria Channel; the wastewater manhole at Canal Este Street and between residential units #36 and #35 and units #54 and #53 full of sewage; and the wastewater manhole at Canal Este Street and Otero Street intersection full of sewage.

58. On November 18, 2014, EPA conducted an inspection of the wastewater collection system at Bahía Residential Development's Sur and Oeste Streets intersection in Cataño, Puerto Rico. During this inspection, EPA found the following: an overflowing wastewater manhole at the end of Oeste and Sur Streets intersection; and an overflowing wastewater manhole at Sur Street and in front of residential unit #114.

59. The wastewater observed during the November 18, 2014 inspection flows into an channel tributary to the Malaria Channel which discharges into the San Juan Bay. Wastewater in area and the channel were found.

60. EPA again inspected the Bahía Residential Development on December 17, 2014, and observed the following: wastewater overflows occurring at Oeste and Sur Streets intersection; two overflowing wastewater manholes; a significant amount of wastewater from an overflowing manhole in front of residential unit #114 at Sur Street; and an overflowing wastewater manhole at the Oeste Street and Sur Street intersection. The wastewater observed during this inspection flows into a channel which is tributary to the Malaria Channel that discharges into the San Juan Bay.

61. On December 19, 2014, EPA conducted an inspection of the storm water and wastewater sewers located in Condado's Piccioni, Delcasse, Vieques and Luisa Streets in San Juan, Puerto Rico. The inspection was performed in response to a citizen complaint relating to wastewater overflows occurring in Condado's Piccioni Street from PRASA's WWCS.

62. During the December 19, 2014 inspection, EPA observed the following: discharge of wastewater into San Juan's municipal separate storm sewer system catch basin at the Piccioni Street and Delcasse Street intersection; a wastewater service connection overflowing at Building 1104 on Piccioni Street with sewage flowing into the Condado Lagoon; overflowing wastewater manholes located near residences on Piccioni Street buildings #1104-1115, #1119; #1121 and #1123; in front of Luisa Street building # 64; and a significant amount of wastewater flowing in the street and into the stormwater collection system that drains into the Condado Lagoon.

63. The wastewater observed during the December 19, 2014 inspection of the storm water and wastewater sewers located at the Condado Streets flows into the stormwater collection system and subsequently into the Condado Lagoon.

64. Inspections conducted by EPA of the Puerto Nuevo RWWTP WWCS reveal that this WWCS has not been well operated and/or maintained, causing untreated sewage discharges

into waters of the United States including but not limited to the Martín Peña Channel, Condado Lagoon, San Juan Bay, Doña Ana Creek, Josefina Creek, Río Piedras River, Juan Méndez Creek, Los Corozos Lagoon, Malaria Channel, Margarita Creek, Puerto Nuevo River, and the Atlantic Ocean.

FIRST CLAIM FOR RELIEF

(CWA - Failure to Comply with Effluent Limits in NPDES Permits at WTPs and WWTPs)

65. The allegations set forth in Paragraphs 1 through 64 are incorporated herein by reference.

66. There has been at least one discharge of a pollutant in excess of the effluent limits prescribed by the NPDES permit for the majority of the WTPs identified in Appendix A to this Complaint.

67. Representative examples of NPDES permit exceedances at the WTPs during the relevant time period are set forth with more specificity in Appendix D to this Complaint, which is incorporated herein by reference.

68. There has been at least one discharge of a pollutant in excess of the effluent limits prescribed by the NPDES permit for the WWTPs identified in Appendix B to this Complaint.

69. Representative examples of NPDES permit exceedances at the WWTPs during the relevant time period are set forth with more specificity in Appendix E to this Complaint, which is incorporated herein by reference.

70. Discharges of pollutants in excess of the effluent limits contained in the NPDES permits for the WWTPs and WTPs constitute violations of the NPDES permits.

71. On each day that PRASA violated more than one of the effluent limitations contained in the NPDES permits, each exceedance of an effluent limitation constitutes a separate violation of the permit.

72. PRASA will continue to violate the effluent limits contained in its NPDES permits unless restrained by this Court.

73. Pursuant to Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319 (b) and (d), PRASA is liable to the United States for injunctive relief and civil penalties up to \$37,500 per day for each violation of the effluent limits contained in its NPDES permits issued thereunder occurring after January 12, 2009.

SECOND CLAIM FOR RELIEF

(CWA - Operation and Maintenance Violations at WWTPs)

74. The allegations set forth in Paragraphs 1 through 73 are incorporated by reference herein.

75. EPA technical personnel conducted inspections at the majority of the WWTPs identified in Appendix B to this Complaint during 2011 and 2012. The inspections reveal numerous instances of PRASA's failure to properly operate and maintain the WWTPs, and related appurtenances, in the manner required by PRASA's applicable NPDES permits. Examples of PRASA failing to properly operate and maintain the WWTPs are described in Appendix F.

76. Paragraphs 39 through 64 describe numerous examples of improper operation and maintenance in the Puerto Nuevo RWWTP collection systems including overflowing manholes, sewage overflowing into streets, ruptured and collapsed pipes, and solids and grease buildup in the sewer pipes. The failure to properly operate and maintain the Puerto Nuevo RWWTP WCS

resulted in discharges from locations not authorized in the Permit and in unauthorized discharges that reached waters of the United States, in violation of Section 301 of the CWA, 33 U.S.C. § 1311.

77. PRASA's failure to properly operate and maintain its facilities constitutes a failure to satisfy a condition of limitation of the applicable NPDES permit for each such WWTP, as required by 40 CFR § 122.41(e).

78. PRASA will continue to improperly operate and maintain its facilities unless restrained by this Court.

79. Pursuant to Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319 (b) and (d), PRASA is liable to the United States for injunctive relief and civil penalties up to \$37,500 for each violation to properly operate and maintain its WWTPs after January 12, 2009.

THIRD CLAIM

(CWA – Illegal and Unauthorized Discharges from Puerto Nuevo RWWTP WCCS)

80. The allegations set forth in Paragraphs 1 – 79 are incorporated herein by reference.

81. From 2010 to 2014 PRASA reported thousands of unauthorized discharges to waters of the United States from its Puerto Nuevo RWWTP WWCS, which were not authorized by its NPDES permit resulting in violations of Section 301 of the CWA, 33 U.S.C. § 1311.

82. Pursuant to Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319 (b) and (d), PRASA is liable to the United States for injunctive relief and civil penalties up to \$37,500 per day for each unauthorized discharge associated with the Puerto Nuevo RWWTP occurring after January 12, 2009.

FOURTH CLAIM FOR RELIEF

(Failure to Report)

83. The allegations set forth in Paragraphs 1 through 82 are incorporated by reference herein.

84. EPA reviewed the 24-hour and 5-day bypass notifications (e.g., Sanitary Sewer Overflow Notifications) submitted by PRASA to EPA for known sewage overflows that occurred in the Puerto Nuevo WWCS, and identified several incidences where PRASA failed to submit 24-hour or 5-day bypass notifications.

85. PRASA's Puerto Nuevo Permit requires that EPA be notified within twenty-four hours from the time PRASA becomes aware of the circumstances of any noncompliance event that may endanger health or the environment. The Puerto Nuevo Permit also requires a written submission to EPA no later than five (5) days of the time that PRASA becomes aware of the circumstances.

86. PRASA failed to submit required notifications for bypasses in violation of the Puerto Nuevo RWWTP NPDES permit on or about the following dates: June 24, 2014 (Haydee Rexach and Lippit Streets, Barrio Obrero); July 16, 2014 (Villa Kennedy Residential Development); August 20, 2014 (Park Gardens Residential Development, Maracaibo and Versailles Street); September 26 and 29, 2014 (Bahía Residential Development); October 2, 2014 (Bahía and Bayview Residential Development); November 18, 2014 (Kings Court Street in Condado); December 2, 2014 (Lealtad Street, Río Piedras); December 9, 2014 (Garden Hills area); December 19, 2014 (Bahía Residential Development); and December 19, 2014 (Piccioni and Delcasse Streets in Condado).

87. Pursuant to Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319 (b) and (d), PRASA is liable to the United States for injunctive relief and civil penalties up to \$37,500 per day for each violation of the CWA occurring after January 12, 2009.

FIFTH CLAIM FOR RELIEF

(Unauthorized Discharges at Pump Stations)

88. The allegations set forth in Paragraphs 1 through 87 are incorporated by reference herein.

89. PRASA has overflows that occur in the areas around the pump stations that PRASA owns and/or operates that are not authorized by its applicable permits.

90. PRASA reported some of these overflows.

91. These overflows violate the applicable permits as the overflows occur from discharge points that are not authorized by the NPDES Permits.

92. Review of reports submitted by PRASA covering the time period of September 1, 2014, through January 1, 2015, illustrate that overflows continue to occur at PRASA pump stations in violation of the NPDES Permits.

93. The overflows identified during the period referenced above are summarized and attached as Appendix G to this Complaint.

94. Pursuant to Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319 (b) and (d), PRASA is liable to the United States for injunctive relief and civil penalties up to \$37,500 per day for each violation of the CWA occurring after January 12, 2009.

SIXTH CLAIM FOR RELIEF

(CWA – Imminent and Substantial Endangerment)

95. The allegations set forth in Paragraph 1 through 94 are incorporated by reference herein.

96. Section 504(a) of the CWA, 33 U.S.C. § 1364(a) states in pertinent part:

Emergency Powers

Notwithstanding any other provision of this chapter, the Administrator upon receipt of evidence that a pollution source or combination of sources is presenting an imminent and substantial endangerment to the health of persons may bring suit on behalf of the United States in the appropriate district court to immediately restrain any person causing or contributing to the alleged pollution to stop the discharge of pollutants causing or contributing to such pollution or to take such other action as may be necessary.

97. On numerous occasions over the past five years, untreated sewage from the Nuevo RWWTP WCS has been released into public and private property where persons have or may have come into contact with such sewage.

98. Untreated sewage from PRASA's WWCS have been released onto public and private property including but not limited to waters of the United States, streets, storm drains, yards, and into buildings, including residential dwellings, located in the Metropolitan area of San Juan, where people have or may have come into contact with such sewage.

99. Untreated sewage can carry bacteria, viruses, and parasitic intestinal worms. These diseases may cause symptoms that range in severity from mild gastroenteritis to life-threatening ailments.

100. Upon information and belief, the release of raw sewage from sewer systems onto public and private property will continue unless enjoined by the Court.

101. Pursuant to Section 504(a) of the CWA, 33 U.S.C. § 1364, the United States seeks an order enjoining PRASA to: 1) take measures to prevent or minimize to the greatest

extent possible the release of sewage from its collection systems onto public and private property where persons may come into contact with it, including but not limited to performing an engineering assessment of the problems and developing and implementing a plan to eliminate the backups; 2) develop a comprehensive response plan to eliminate the release of sewage and other pollutants from its collection systems not authorized by its Permits; 3) improve public outreach and communications to notify the public about the risks associated with contacting sewage; and 4) take such other action as may be necessary to abate and mitigate releases or sewage from PRASA's collection systems.

REQUEST FOR RELIEF

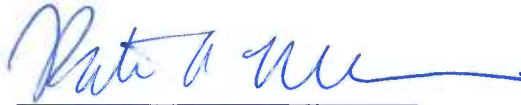
WHEREFORE, the United States of America requests that this Court:

1. Issue a permanent injunction that enjoins PRASA, pursuant to CWA Sections 309(b), 33 U.S.C. § 1319(b), and 504(a), 33 U.S.C. § 1364(a), from discharging pollutants except as expressly authorized by the Clean Water Act and the applicable NPDES permits; and orders PRASA, pursuant to Section 309(b) of the CWA, 33 U.S.C. § 1319(b), to undertake a program to achieve permanent, consistent compliance with all the terms and conditions of the applicable NPDES permits, as well as the CWA and the regulations promulgated thereunder;
2. Assess civil penalties against PRASA pursuant to Section 309(d) of the Act, 33 U.S.C. § 1319 (d), for each violation of each NPDES Permit and each violation of the CWA applicable to each of the WTPs, including all appurtenances thereto, of up to \$37,500 per day for each violation occurring after January 12, 2009, up to the date of judgment herein;
3. Order PRASA to reimburse the United States for the costs and disbursements of this action, as appropriate; and
4. Such other and further relief as this Court deems just and proper.

Dated: *September 15, 2015*

Respectfully submitted,

JOHN C. CRUDEN
Assistant Attorney General
Environment and Natural Resources
Division



PATRICIA A. MCKENNA
Senior Attorney
Environmental Enforcement Section
Environment & Natural Resources
Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
(202) 616-6517

ROSA E. RODRIGUEZ-VELEZ
United States Attorney
District of Puerto Rico

HECTOR RAMIREZ
Assistant United States Attorney
District of Puerto Rico
Federal Office Building, Room 101
Carlos E. Chardon Avenue
Hato Rey, Puerto Rico 00918

Of Counsel:

EDUARDO GONZALEZ
Assistant Regional Counsel
Office of Regional Counsel
United States Environmental
Protection Agency
290 Broadway
New York, New York
(212) 637-3223

APPENDIX A

Appendix A

List of Wastewater Treatment Plants (WWTPs) covered by Consent Decree (as of date of Lodging)

Num.	WWTP Name
1	Adjuntas
2	Aguadilla
3	Aguas Buenas
4	Aibonito
5	Alturas de Orocovis
6	Arecibo
7	Barceloneta
8	Barranquitas
9	Bayamón
10	Caguas
11	Camuy
12	Carolina
13	Cayey
14	Ciales
15	Comerio
16	Corozal
17	Culebra
18	Dorado
19	Fajardo
20	Guánica
21	Guayama
22	Guayanilla
23	Humacao
24	Isabela
25	Jayuya
26	Lajas
27	Lares
28	Las Marías
29	Maricao
30	Maunabo
31	Mayagüez
32	Morovis
33	Naranjito
34	Orocovis
35	Parcelas Borinquen
36	Patillas
37	Peñuelas
38	Ponce
39	Puerto Nuevo
40	Rio Grande Estates
41	San Germán
42	San Sebastián New
43	San Sebastián Old
44	Santa Isabel

Appendix A

List of Wastewater Treatment Plants (WWTPs) covered by Consent Decree (as of date of Lodging)

Num.	WWTP Name
45	Toa Alta
46	Unibón
47	Utado
48	Vega Alta
49	Vega Baja
50	Vieques
51	Yabucoa
52	Yauco

APPENDIX B

Appendix B

List of Water Treatment Plants (WTPs) covered by Consent Decree (as of date of Lodging)

Num.	WTP Name
1	Aceitunas
2	Adjuntas (Garzas)
3	Adjuntas Vieja (Olimpia)
4	Aguadilla
5	Aguas Buenas
6	Aibonito Urbano
7	Almirante Sur
8	Añasco
9	Apeadero
10	Arecibo Urbano
11	Barrancas
12	Barranquitas Urbana
13	Barrio Nuevo
14	Betances
15	Bucarabones
16	Caguas Norte
17	Caguas Sur
18	Canalizo
19	Canóvanas
20	Cayey
21	Cedro Arriba
22	Ceiba Sur
23	Ciales Urbana (Cordillera)
24	Cidra
25	Coamo
26	Comerio
27	Corozal
28	Coto Laurel
29	Cubuy
30	Cubuy Maizales
31	Culebras Alto
32	Culebrinas
33	El Duque
34	El Yunque
35	Enrique Ortega (La Plata)
36	Esperanza
37	Espino
38	Fajardo Nueva
39	Farallón
40	Frontón
41	Guajataca
42	Guama
43	Guaraguo
44	Guayabota

Appendix B

List of Water Treatment Plants (WTPs) covered by Consent Decree (as of date of Lodging)

Num.	WTP Name
45	Guayama
46	Guayanés
47	Guaynabo Los Filtros
48	Guilarte
49	Gurabo
50	Guzmán Arriba
51	Hatillo-Camuy
52	Hogares Seguros
53	Humacao
54	Indiera Alta (Bartolo)
55	Isabela
56	Jagual
57	Jaguas Pasto
58	Jaguas-Ceiba
59	Jagüeyes-Villalba
60	Jayuya
61	Jiménez
62	Juncos Urbano
63	La Boca
64	La Máquina
65	La Pica
66	La Plata Nueva (Aibonito)
67	Lajas
68	Lares
69	Lares Nueva (Espino)
70	Las Delicias
71	Las Marías
72	Liza
73	Luquillo (Sabana)
74	Maginas
75	Malpaso
76	Mameyes de Utuado (Abajo)
77	Mameyes Limón (Arriba)
78	Maricao
79	Matrullas
80	Matuyas
81	Minillas
82	Miradero
83	Monte del Estado
84	Morovis Sur
85	Morovis Urbano
86	Negros Corozal
87	Orocovis
88	Patillas

Appendix B

List of Water Treatment Plants (WTPs) covered by Consent Decree (as of date of Lodging)

Num.	WTP Name
89	Peñuelas
90	Ponce de León
91	Ponce Nueva
92	Ponce Vieja
93	Pozas
94	Quebrada
95	Quebradillas
96	Rancheras
97	Real Anón
98	Río Arriba
99	Río Blanco
100	Rio Grande (Morovis)
101	Río Prieto Sur
102	Rochas
103	Roncador
104	Rucio
105	Sabana Grande
106	Sabana Grande de Utuado
107	San Lorenzo (Cerro Gordo)
108	San Sebastián
109	Sanamuerto
110	Santa Isabel
111	Sergio Cuevas
112	Superacueducto
113	Tibes
114	Toa Vaca
115	Utuado Urbano
116	Vega Baja Urbana
117	Yabucoa (La Pica)
118	Yahuecas
119	Yauco

APPENDIX C

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
1	Adjuntas	Adjuntas Plaza
2		La Playita
3		San Joaquin
4	Aguadilla Regional	Barrero PS
5		Borinquen (Los Chiches)
6		Caceres
7		Casualidad
8		Complejo Deportivo Corivadas
9		Corrales
10		Cruz Isleta PS
11		El Prado
12		Estela P S
13		Guerrero Ward
14		Industrial Aguacate I
15		Industrial Aguacate II
16		Jardin del Atlantico - Elderly Housing
17		Jardines de Maribel
18		Lift Station No. 5
19		Los Almendros
20		Los Robles
21		Moca (Pueblo)
22		Moca El Parque
23		Montana
24		Montana Industrial Area
25		Paseos de San Antonio
26		Poblado San Antonio
27		Poblado San Antonio High School
28		Pump Pit
29		Rafael Hernandez
30		Ramey No. 2 (4424)
31		Ramey No. 4 (main)
32		Ramey No.1 (813)
33		Rincon
34		Rincon II
35		San Antonio
36		San Cristobal
37		Troncal Este
38		Villa Alegria
39		Villa Marbella
40		Villa Turistica
41		Vista Azul
42		Voladoras
43	Aguas Buenas	Monserate
44		Palmas Reales
45		San Antonio
46		Sonadora (Mulas)
47		Vistas de Jagueyes
48	Aibonito	Hacienda Kamila (Jatibonito)
49		Altos de la Villa
50		Bajadero
51		Coca Cola
52		Coca Cola (Rodriguez Olmo)
53		Dominguito I
54		Dominguito II
55		Dominguito III

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
56	Arecibo	Escuela Jose R Rivera
57		Estancias de la Sabana
58		Hacienda Toledo LS
59		Islote 1
60		Islote 2
61		Jardines de Arecibo
62		Jardines de San Rafael
63		Las Brisas
64		Pajuil
65		Puerta del Este (Paseos Reales)
66		Sabana Hoyos 2
67		Santana (Los Pinos)
68		Villas de Garrochales
69	Barceloneta	Buffalo
70		Campo Alegre
71		Campo Alegre LS
72		Cimarrona (Magueyes)
73		Coto Norte
74		Estancias de Tortuguero
75		Ext Estancias de Tortuguero
76		Florida a Barceloneta
77		Florida Pueblo
78		Jardines de Monaco
79		Las Vegas
80		Luchetti
81		Monte Verde 1
82		Monte Verde 2
83		Pajonal 1
84		Pajonal 2
85		Pajonal 3
86		Plazuela
87		Porto Fino
88		Pta. Palmas II
89		San Francisco
90		Villas de Manati
91		Vistas de Atenas
92	Barranquitas	Barranquitas
93		El Porton
94		Palo Hincado I
95		Palo Hincado II
96		Altavista Court
97		Altomonte
98		Bay View
99		Bo Piñas Esc Intermedia
100		Camino del Mar
101		Campanillas
102		Campo Verde
103		Campos del Toa
104		Ciudad Jardin
105		Colimar
106		Colinas Metropolitanas
107		El Alamo
108		El Zorzal-Bethel
109		Enramada
110		Estancias de Altomonte

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
111	Bayamón	Estancias de Cerro Gordo 2
112		Fuente Bella
113		Hacienda Elena I
114		Hacienda Elena II
115		Hacienda Elena III
116		Hillside
117		Jardines de la Fuente
118		La Pradera
119		La Providencia
120		Lagos de Plata
121		Las Americas
122		Las Colinas
123		Las Gaviotas
124		Las Vegas
125		Las Veredas
126		Levittown 1
127		Levittown 2
128		Luchetti
129		Mabo
130		Mansiones de Guaynabo
131		Mansiones de Monte Casino
132		Martinez Nadal
133		Miraflores
134		Monte Sol
135		Monte Verde
136		Palacios del Monte
137		Palacios del Rio
138		Palmar del Rio
139		Palo Seco
140		Paseo Altavista
141		Piedras Blancas
142		Porticos de Guaynabo
143		Praderas del Rio
144		Puente Blanco
145		Qintas del Rio
146		Rio Plantation
147		Ridge Top Luxury Apts.
148		Riverview
149		San Pedro
150		San Rafael
151		San's Souci
152		Santa Catalina
153		Serena
154		Siderurgica
155		Sierra Berdecia
156		Sierra Taina
157		Toa Alta Heigh LS
158		Toa Alta Heights WWTP
159		Toa Linda
160		Vacio Ingenio
161		Valencia
162		Valle Santa Olaya
163		Villas de Buena Vista
164		Vistas del Bosque
165		Altos de La Fuente

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
166	Caguas Regional	Alturas de Hato Nuevo
167		Alturas Villa del Rey
168		Amgen
169		Angora India
170		Barriada Roosevelt
171		Caguas Norte
172		Cementerio
173		Ciudad Jardin
174		Colinas
175		El Encanto
176		Ensanche
177		Escuela El Mango
178		Estancias de Juncos
179		Estancias del Lago
180		Estancias del Rio
181		Ferrero
182		General Electric
183		Gran Vista II
184		Hato
185		Industrial - San Lorenzo
186		Jardines de Cerro Gordo
187		Jardines de San Lorenzo
188		Jose Delgado
189		José Mercado #1
190		Jose Mercado 2
191		Jose Mercado No. 2
192		Juncos Plaza
193		La Placita (Laderas Nueva)
194		La Serranía
195		Laderas de Juncos
196		Laderas de San Juan
197		Las Carolinas
198		Lirios Cala
199		Los Almendros
200		Los Flamboyanes
201		Los Prados
202		Los Robles
203		Los Tolinches
204		Maga Tree
205		Pachanga
206		Quintas De San Luis
207		Reina de Los Angeles
208		Salvatierra I
209		Salvatierra II
210		San Pedro States
211		Santa Barbara
212		Santa Elvira
213		Santa Rosa
214		Valle de San Luis
215		Valles del Lago
216		Villa Caliz I
217		Villa Caliz II
218		Villa Del Rey I
219		Villa Del Rey IV
220		Villa Esperanza

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
221	Camuy	Vistas del Rio
222		Carrizales
223		Costa Norte
224		Lift Station No. 13
225		Los Corales
226		Luis Rodriguez
227		Mar Azul
228		Punta Maracayo
229		Terranova
230		Vistas (Brisas) de Camuy
231	Carolina	Brisas de Loiza
232		Buenaventura
233		Carolina Industrial Park
234		Carolina Pueblo
235		Ciudad Central
236		Conquistador 1
237		Conquistador 3
238		Country Club
239		El Cabo
240		Encantada
241		Guzman Abajo
242		Hacienda Real
243		Haciendas de Carraizo
244		Hong-Kong
245		Hoyo Mulas Sludge
246		Industrial Las Cuevas
247		Jardines de Carolina
248		La Ceramica
249		La Gallera
250		La Lomita
251		Loiza Apt
252		Loiza D
253		Loiza E (Parcelas Vieques)
254		Loiza Pueblo
255		Lomas de Carolina
256		Los Angeles
257		Los Colobos
258		Los Mirtos
259		Lourdes
260		Malibu Beach
261		Martin Gonzalez
262		Metropolis
263		Mini Mini
264		Montecarlo
265		Parque de Montebello
266		Parque Ecuestre
267		Parque Escorial
268		Rio Cristal
269		Rio Grande - Carolina (ALC)
270		River Garden
271		River Valley
272		Sabana LLana
273		San Isidro
274		San Martin
275		Santa Maria

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
276		Torrecillas
277		Trujillo Alto (Pueblo)
278		Trujillo Alto (Puente)
279		Victoria Industrial
280		Villa Carolina
281		Villa Carolina (Eyectores)
282		Villas de Rio Grande
283		Villas del Mar
284		Vistamar (El Moroco)
285		Vistamar Marina
286		Wonderville
287	Cayey-Cidra	Arenas
288		Beatriz PS
289		Cidra 2
290		Cidra I
291		Ciudad Primavera (Estancias del Bosque)
292		Consolidated (Cigar)
293		Estancias de Cidra (Zapera)
294		Estancias de Monte Rio
295		Fuente de Agua Viva
296		Mansiones de Monte Verde
297		Maton 1
298		Maton 2
299		Miguel Rivera Martinez (Santa Teresita)
300		Reparto Montellano
301		Rincon Master
302		San Tomas
303		Treasure Valley
304	Ciales	Barahona Ward No. 1
305		Barahona Ward No. 2
306		Brisas de Jaguas
307		Caliche
308		Casita
309		Dos Rios
310		Las Guavas
311		Pueblito
312		Valle Barahona
313		Valles San Luis
314	Comerio	Comerio Troncal
315		Sabana del Palmar
316	Corozal	Cerro Monte
317		El Idilio
318		Maria del Carmen
319		Monte Rey
320	Culebra	Aeropuerto
321		Estación Auxiliar de Relevó
322		Campanilla Ward School Pumping Station
323		Candelaria Arenas
324		Clusters (Villas del Mar)
325		Costa de Oro
326		Dorado Beach
327		Dorado Beach East LS
328		Dorado Country Estates
329		Dorado del Mar
330		Dorado Reef

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
331	Dorado	Dorado Regency
332		Dorado Royale
333		Esc. Jose de Diego
334		Estancias de Cerro Gordo
335		Estancias de San Nicolas
336		La Pachanga
337		Los Prados
338		Mameyal
339		Monte Elena
340		North Coast Village
341		Palma Dorada
342		Sabanera
343		San Antonio (Dorado)
344		Toa Baja
345		Vega Alta Dorado Club LS
346		Villa Alegria
347	Fajardo Regional	Aguas Claras
348		Allen Group
349		Alturas San Pedro
350		Barriada Obrera
351		Brisas de Ceiba
352		Brisas del Mar
353		Casa del Mar
354		Costa Azul
355		Costa Esmeralda
356		Costa Real
357		EBAS CINEMAS
358		Fajardo
359		Fajardo "Gardens"
360		Juan Martin
361		Las Gaviotas
362		Las Vegas
363		Los Kioskos
364		Luis Cintron
365		Montesol
366		Paisaje del Lago
367		Palmer
368		Posa del Mar
369		Puerto Real
370		Sanitary pump station
371		Santa Isidra
372		Santa Maria.
373		Solimar
374		Villa Marina
375		Villa Penetro
376		Villas del Pilar
377		Vistas del Convento
378		Westin Rio Mar
379	Guánica	Bacó
380		Bahia Guanica (Playa)
381		Ensenada
382		Salinas Providencia
383		Aguirre-Montesoria I
384		Algarrobo
385		Arroyo (Troncal Arroyo)

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
386	Guayama	Branderi (Troncal)
387		Campamento
388		Ciudad Universitaria
389		Green Hills
390		Hacienda Los Recreos
391		Hostos (Mirasol)
392		Hostos (Nueva)
393		Jardines de Guamani
394		Jobos Penal
395		La Margarita
396		Las Ochentas
397		Olimpo
398		Palmas
399		Playa Salinas
400		Portal de Ancones
401		Puente de Jobos (Troncal)
402		Salinas (Troncal)
403		San Felipe
404	Guayanilla	Bahia
405		Costa Sur 2
406		Costa Sur 3
407		La Concepcion
408		Municipal
409	Humacao Regional	April Gardens
410		Arenales
411		Botijas
412		Brisas del Rio
413		Brisas del Valle
414		Buena Vista
415		Buxo
416		Campo Real
417		Candelero
418		Casabella
419		Ciudad Cristiana
420		Club Civico
421		Estancias de la Via
422		Estancias de Naguabo
423		Fomento
424		Fomento Industrial
425		Hucares II
426		Hucares II (Fomento)
427		Jardin del Este
428		Johnson & Johnson
429		Junquito
430		La Campina
431		La Inmaculada
432		Las Piedras Food Park
433		Las Piedras-Humacao
434		Mc Neill
435		Melillas
436		Montones
437		Naguabo-Humacao PS No. 3
438		Naguabo-Humacao Trunk PS No. 2
439		Olimpic
440		Park Hurst

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
441		Patagonia
442		Portal de Las Piedras
443		Pueblito del Rio
444		Rio Blanco Heights
445		Schering-Plough
446		Schering-Plough 2
447		Valle Piedras
448		Villa del Rio
449		Villa Delicias
450		Villas de Candelero
451		Villas de Humacao
452		Villas de San Cristobal
453	Isabela	Aguadilla Avenue
454		Bomberos
455		Corchado
456		Industrial
457		Isla Azul
458		Villa Pesquera
459		Vista Isabela PS
460	Jayuya	Industrial Travenal
461		La Monserrate
462		Santa Clara
463	Lajas	Boqueron
464		El Valle
465		Estancias del Parra 2
466		Estancias del Parra I
467		Extension El Valle
468		Fomento
469		Jardines de Lajas
470		La Parguera II
471		La Parguera Nueva
472		Palmerejo 2
473		Playita Rosada
474		Submarino
475		Villa Taina
476	Lares	Altamira
477		Brisas de Lares (Jardines de Lares)
478		Centro Operaciones
479		Escuela Bo. Piletas
480		Lares Mills
481		Montellano
482		Palmas del Sol
483		Planta Vieja (Lares)
484		Viera
485		Villa Borinquen
486	Las Marías	El Hospital
487		Jardines
488		Las Bambuas
489		Maravilla Sur I
490		Maravilla Sur II
491	Maunabo	Emajagua
492		Talante
493		Villas del Faro
494		Anasco
495		Ballaja

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
496	Mayagüez	Cabo Rojo Pueblo (Main)
497		Caracoles & Pinales
498		Centro Renal
499		Colegio
500		Colombia
501		Concepcion
502		Concordia (Boca Morena)
503		Confresi (Sierra Linda)
504		Coqui Bajura
505		El Deportivo
506		El Hoyo
507		El Remanso
508		Girasol
509		Guanajibo Homes Pump Station
510		Hacienda Constancia
511		Haciendas del CLub
512		Jardines de Mayaguez
513		Josefa
514		La 15
515		La Garita
516		Lavadero Nueva 1
517		Lavadero Nueva 2
518		Lift Station
519		Llavat
520		Mansiones de Cabo Rojo
521		McDonalds
522		Monte Grande
523		Periche
524		Perle Du Mer
525		Poblado Rosario
526		Pozo Hondo
527		Puerto Real I
528		Puerto Real II
529		Pump Station 2
530		Pump Station 3
531		Ramirez de Arellano
532		Rio Mar
533		Roosevelt
534		Sabalos (Main Pumping Station)
535		Santurce
536		Sultana
537		Torre Marsella
538		Valles de Añasco
539		Vistas del Rio
540	Morovis	Cruz Rosario LS
541		Las Cumbres (Buena Vista)
542		Morovis Pueblo
543		Palmas del Sur
544		Praderas de Morovis Sur
545		Torrecillas I
546		Torrecillas II
547		Torrecillas III
548		Torrecillas IV
549		Torrecillas V
550		Torrecillas VI

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
551	Naranjito	Villas del Norte
552		Achiote
553		Jardines de Naranjito
554	Orocovis	Barros I
555		Barros II
556		Orocovis
557		Villa Cooperativa
558	Patillas	El Bajo
559		La Felicita (Valles de Patillas)
560		La Providencia
561		Portales de Jacabo
562		Soymar
563	Peñuelas	Plaza Peñuelas
564		Plaza Peñuelas 2
565		Rio Sol
566		URB. Miramonte
567	Ponce	Alta Vista
568		Camino del Sur
569		Constancia (Caracoles) PS
570		Emilia Bonilla/Escuela La Vega
571		Guayabal
572		Guayabal II
573		Industrial Sabanetas
574		Jagueyes
575		Julio Enrique Monagas
576		La Ceiba
577		Las Americas
578		Las Delicias
579		Las Lomas
580		Leonardo Santiago
581		Los Caobos
582		Merceditas
583		Monte Sol
584		Pastillo
585		Perla del Sur
586		Ponce RWWTP
587		Punta Carenero
588		Regional Center (El Tuque)
589		Salazar
590		Santa Marta
591		Valle Alto
592		Valle Real
593		Villa Grillasca
594		Villa Hucars
595		Amelia
596		Andalucia
597		Bo. Obrero Vacuum
598		Buen Consejo
599		Caney
600		Cantera Air Vacuum
601		Ciudad Universitaria
602		Colinas de Cupey
603		Colinas de Montecarlo
604		Constitucion
605		Covadonga

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
606	Puerto Nuevo	Cupey Gardens
607		El Capa
608		El Coqui
609		El Morro
610		El Vigia
611		Escambron
612		Extension Villa Andaluia
613		Eyectores Isla Verde
614		Fairview 1
615		Fairview 2
616		Fairview 3
617		Gardenville
618		Highland Park
619		Hill Brothers
620		Hotel Isla Verde (Holiday Inn)
621		Huyke
622		Isla Verde Villamar
623		Jardines de Trujillo Alto
624		Joffre
625		La Campina
626		La Marina
627		La Puntilla
628		La Rabua
629		Labra
630		Las Cumbres
631		Las Margaritas Apt
632		Lomas de Trujillo Alto
633		Los Corosos
634		Los Laureles
635		Los Lirios
636		Martin Pena (Tokio)
637		Mirador Las Casas
638		Monte Brisas
639		Monte Real
640		Montehiedra 1
641		Montehiedra 2
642		Nemesio Canales
643		Paseos de San Juan
644		Perla
645		Prado Alto
646		Pueblo Seco
647		Rincon Espanol
648		San Fernando
649		San Gerardo
650		Santa Clara
651		UM 49
652		Villa Andaluia
653		Villa Capri
654		Villa del Sol
655		Villas El Paraiso
656		Vista Alegre
657	Río Grande Estates	Coco Beach
658		Río Grande Estates
659		Rio Grande Loiza (R. G. Estates)
660		Rio Grande States

Appendix C

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
661	San Germán	El Poli
662		El Real
663		Fomento
664		La Maquina I
665		La Maquina II
666		La Nueva Salamanca
667		Las Guaras
668		Minillas
669		Quintas del Rey
670		Reparto Universitario
671		Sabana 1
672		Sabana 2
673		Sabana Eneas
674		Sabana Grande
675		Santa Ana
676		Santa Ana (Mansiones de Sabana Grande)
677		Santa Marta (Riverside)
678	San Sebastián Nueva	Comunidad Gonzalez 2
679		Fomento-Avon
680		Gonzalez 1
681		Los Alamos
682		Parque
683	San Sebastián Vieja	Villa Sofía Nueva
684		Villa Sofía Vieja
685	Santa Isabel	Coamo Main
686		Jacaranda
687		Jaucas
688		Niagras
689		Playa Cortada
690		Portal La Reina
691		Praderas del Sur
692		Provincias del Rio
693		Puerto Arturo
694		Quintas de Coamo
695		San Idelfonso
696		Santa Ana
697		Valle Arriba
698		Valle Escondido
699		Villa Pulga
700	Toa Alta	Green Valley
701		Jardines de Toa Alta
702		Mansiones de Rio Lajas
703		Pina (El Cementerio)
704		Veredas del Rio
705		Villa Matilde
706	Unibón	Unibon 1
707		Unibon 2
708		Unibon 3
709		Unibon 4
710		Unibon 5
711	Utua Urbano	Alturas de Utua
712		Calle Progreso
713		Colegio Regional
714		La Playita
715		Perez Matos

List of WWTP Pump Stations covered by Consent Decree (as of Date of Lodging)

Num.	WWTP	WWPS Name ¹
716		San Jose
717		Santa Clara
718		Urbanizacion Cabrera
719		Utua de Nueva Salto Abajo LS
720	Vega Alta	Corea
721		Dorado Industrial Park
722		Extension Santa Ana
723		General Electric (Industrial GE)
724		Los Montes
725		PumpStation3Maricao
726		Santa Ana
727		Valle Dorado
728		Vega Alta GE LS
729		Verde Luz
730	Vega Baja	Alturas de Vega Baja
731		Brazilia
732		Ciudad Real
733		El Rosario
734		Guarcio Viejo
735		Jardines de Vega Baja
736		Ojo de Agua
737		San Demetrio
738		Villa La Playa LS
739		Villa Los Pescadores
740		Villa Pinares
741	Vieques	Casa de Playa
742		Casa de Playa 2
743		Comunidad Esperanza
744		Comunidad Esperanza 2
745		Florida
746		Fomento - Vieques
747		Jardines de Vieques
748		Jardines de Isabel II
749		Reparto Lucila Franco
750		Rieckhoff
751		Sun Bay
752		Tortuguero
753	Yabucoa	Buena
754		Comunas
755		Dr. Berrios
756		Jaime C. Rodriguez
757		Limones
758		Trinidad
759		Winston
760	Yauco	Barinas Nueva
761		Jacanas
762		Lluberas (Susua)
763		Luchetti
764		Montblanc
765		Oasis (Belgica)
766		Palomas
767		San Francisco
768		Villas Del Cafetal

¹ Based on PRASA's GIS Database updated as of October 2014.

APPENDIX D

APPENDIX D --- Effluent Violations at WTPs

WTP	Month	Parameter
Aguas Buenos WTP	12/1/2014 7/1/2014	Copper, lead Turbidity
Arecibo	2/2014	Copper, fecal coliforms, zinc
Aibonito WTP	8/1/2014-11/1/2014 9/1/2014	Copper BOD
Barranquitas WTP	9/1/2014 12/1/2014	BOD Dissolved Oxygen
Caguas WTP	1/1/2014-6/2014, 9/1/2014-11/2014 9/1/2014-10/1/2014	Copper Residual Chlorine
Cayey (Farallon) WTP	3/1/2014, 6/1/2014, 10/1/2014 10/1/2014	Copper Turbidity
Ceiba Sur	1/1/2014-2/1/2014, 7/1/2014- 9/1/2014	Fecal coliforms
Cidra	4/1/2014, 11/2014	Dissolved oxygen
Cedro Arriba	9/2014	Arsenic, BOD, total dissolved solids, turbidity
Correrio-Rio Hondo	11/2014 7/2014, 10/2014	Ammonia Arsenic
Espino	5/2014	BOD
Guayanes	9/2014	Turbidity
Guayabota	5/2014	BOD
Guillarte	8/2014	Copper
Gurabo	6/2014 6/2014, 11/2014	BOD/copper Ammonia
Humancao-Las Pietras	11/2014	Ammonia
Jagual	10/2014 3/2014	Ammonia Turbidity, lead
Minillas	5/2014 10/2014	BOD Copper, lead
San Lorenzo	5/2014 1/2014, 7/2014	Ammonia Oil and grease
Canovanas	5/2014	Ammonia
Guaynabo	7/2014 5/1/2014	Mercury Fecal coliforms
Morovis Norte	2/2014	Ammonia
Morovis Sur	2/2014	Ammonia
Quebrada	6/2014	Fluoride
Boqueron-Betances	5/2014	BOD
Las Manias	6/2014	Fluoride
Miradero	5/2014	Dissolved oxygen, flow, pH, residual chloride, settleable solids, temperature

Roche	9/2014	Flow
Sabana Grande	9/2014	Flow
Aceitunas	3/2014	Copper, oil and grease
Hogares Seguros	6/2014	Fluoride
Jagua Ceiba	9/2014	BOD
Malpaso	6/2014	Fluoride
Adjuntas	9/2014	Arsenic, BOD, cadmium, copper, phosphorus, lead, turbidity, zinc
Coamo	5/2014	Mercury
Guayana	11/2014	Turbidity
Matrullas	6/2014	BOD, color, fluoride, ammonia, total dissolved solids, turbidity
Maunabo	9/2014	Oil and grease
Ponce Nueva	3/2014	Sulfate
Real Anón	9/2014	BOD, chlorides, color, copper, fluoride, fecal coliforms, flow, ammonia, phosphorus, lead, sulfate, total coliforms, total dissolved solids, turbidity, zinc
Yahuecas	7/2014	Dissolved oxygen, flow, pH, residual chlorine, settleable solids, temperature
Culebras-Cayey	10/2014	Turbidity
El Yunque	1/2014, 5/2014-6/2014, 8/2014-9/2014	Fecal coliforms
Juncos	2/2014	BOD, turbidity
La Plata	4/2014 2/2014, 4/2014-5/2014	BOD Turbidity
Luquillo	7/2014	Turbidity
Maizales	1/2014-3/2014, 7/2014-12/2014 2/2014, 7/2014-9/2014	Copper Lead
Morovis-Rio Grande	2/2014-12/2014 2/2014-3/2014, 5/2014, 9/2014, 11/2014	Copper Lead
Jaquas y Pesas	7/2014	Cadmium
La Pica	3/2014	Total dissolved solids
Lares Nuevas	10/2014	Residual chloride
Rio Blanco	2/2014 9/2014	BOD Copper
San Lorenzo	1/2014-4/2014, 8/2014-9/2014	Turbidity
Barrio Nuevo	6/2014-12/2014	Residual chloride

Cubuy	7/2014-10/2014	pH
Enrique Ortega	1/2014-2/2014, 4/2014-12/2014	Residual chloride
Guzman Arriba	4/2014, 6/2014	Cadmium
Senoio Cuevas	4/2014-7/2014 3/2014-4/2014, 7/2014 10/2014	Dissolved oxygen BOD pH
Ciales	7/2014	Fecal coliforms, turbidity
Fontón	9/2014	Turbidity
Hatillo	8/2014-9/2014	Copper, lead, turbidity
Jaqua Pasto	10/2014	Arsenic, phosphorus
Orocovis	11/2014	Color
Ponce Nuevo	12/2014	Residual chlorine
Mameyes Abajo	6/2014	Lead
Morovis Sur	12/2014	Copper, ammonia, lead, turbidity, sulfide, zinc
Negros	11/2014	Copper, mercury, phosphorus, lead, turbidity
Quebrada	7/2014	Turbidity
Rio Arriba	11/2014	Total dissolved solids
Roncador	12/2014	Turbidity
Sabana Grande Ward	3/2014, 6/2014, 9/2014	Mercury
Sanamuerto	10/2014	Turbidity, BOD
Santa Isabel	12/2014	Cyanide free
Utua	12/2014	Copper, lead
Aquidilla	8/2014	Arsenic
Añasco	7/2014	Fecal coliforms, turbidity, zinc
Bocarabones	7/2014	Copper, lead
Cañ Alto	11/2014	Copper
Calebrinas	6/2014-10/2014, 12/2014	Fecal coliforms
Guajataco	1/2014	Mercury
Isabela	9/2014	Residual chlorine
La Máquina	1/2014	Copper
Cajas	11/2014-12/2014	Lead
Maricao	12/2014	Cadmium
Mayaquéz	7/2014	BOD, copper, lead, turbidity
Miradero	11/2014	Turbidity, color
Monte del Estado	2/2014	BOD
San Sebastian	7/2014	Turbidity, phosphorus
Ponce Vieja	6/2014	Mercury
Real Anón	5/2014	Fecal coliforms
Rucio	10/2014	BOD
Villalba Regional	10/2014, 9/2014	Dissolved oxygen
Villalba WTP	9/2014	Copper, phosphorus, lead, turbidity

APPENDIX E

APPENDIX E -- Effluent Violations at WWTPs

WWTP/NPDES Permit #		Mo/Yr.	NPDES Permit Violations by Parameter
Aguas Buenas	PR0020273	07/11	Color
Aibonito	PR0025461	05/11	Fecal Coliforms
Barranquitas	PR0025861	05/11 07-08/11	Arsenic
Caguas	PR0025976	07-08/11 06/11	Arsenic Phosphorus
Cayey	PR0025356	06-08/11 06-08/11 07/11 08/11	Arsenic Color Copper Phosphorus
Comerio	PR0025658	05-06/11	Fecal Coliforms
Rio Grande Estates	PR0023264	08/11 05/11, 08/11	Fecal Coliforms Total Suspended Solids
San Lorenzo	PR0020834	05-08/11 05/11, 07/11 06/11	Arsenic Copper Ammonia
Vieques	PR0025453	07/11 08/11 06/11, 08/11 08/11	Cyanide Enterococcus Fecal Coliforms Residual Chlorine
Yabucoa	PR0021717	08/11 07/11	BOD5 Fecal Coliforms, Total Coliforms
Bayamon	PR0023728	07/11 08/11	Color Nickel
Carolina	PR0023752	07/11 05/11	Color Lead
Puerto Nuevo	PR0021555	07/11	Color
Camuy-Hatillo	PR0023744	05-06/11, 08/11 05-08/11 07-08/11 06-08/11	Cyanide Copper Dissolved Oxygen Enterococcus
Ciales	PR0020427	07/11-08/11 07/11 06/11 05/11, 07-08/11	BOD5 Copper Fecal Coliforms TSS
Corozal	PR0020454	08/11	Fecal Coliforms, Total Coliforms
Dorado	PR0020460	08/11	Fecal Coliforms

		06/11, 08/11	pH
Lares	PR0025879	05/11	Turbidity
Morovis	PR0020711	05-06/11 05/11 06/11	BOD 5 Residual Chlorine Total Suspended Solids
Naranjito	PR0020737	05/11	Residual Chlorine
Utuado (New)	PR0026603	05-07/11 06-07/11 06-07/11 06/11 05/11	Arsenic Copper Fecal Coliforms Total Coliforms Total Dissolved Solids
Vega Alta	PR0020923	08/11	Fecal Coliforms, Total Coliforms
Vega Baja	PR0021679	06-08/11 06-08/11 08/11 06-07/11 06-08/11	Arsenic Dissolved Oxygen Fecal Coliforms Residual Chlorine Total Dissolved Solids
Alutras de Orocovis	PR0023001	05/11 06/11	pH Residual Chlorine
Guanica	PR0020486	05/11 05/11 and 07- 08/11	Enterococcus pH
Toa Alta	PR0020869	10/09 09/09 and 12/09	Dissolved Oxygen Fecal Coliforms
Guayama	PR0025445	05-08/11 06-07/11 05/11, 07/11 07/11	BOD 5 Dissolved Oxygen Enterococcus Fecal Coliforms, Total Coliforms
Maunabo	PR0020656	06/11, 08/11 06 – 08/11	Copper Residual Chlorine
Patillas	PR0020753	06-07/11 06/11 06-07/11 06/11	Fecal Coliforms Residual Chlorine Total Coliforms Total Suspended Solids
Peñuelas	PR0020761	08/11	Residual Chlorine
Ponce	PR0021563	06-07/11 05-06/11, 08/11 05/11, 08/11 05/11, 07-08/11	Arsenic Cyanide Fecal Coliforms Residual Chlorine
Santa Isabela	PR0023761	07/11 07/11	Enterococcus Fecal Coliforms, Total Coliforms

Yauco	PR0021661	07-08/11 08/11 06-08/11 05/11	Arsenic Fecal Coliforms Residual Chlorine Total Dissolved Solids
Parcelas Borinquen	PR0025101	01/10, 08-09/10	Fecal Coliform
San Sebastian (New)	PR0025551	04/10	Temperature
Boquerón	PR0023442	06/11 06-08/11 06-07/11 05-06/11	BOD 5 Enterococcus Fecal Coliforms Total Suspended Solids
Isabela	PR0022250	08/11	BOD 5, Total Suspended Solids
Lajas	PR0020575	05-07/11 05/11 06-08/11	Arsenic Fecal Coliforms Phosphorus
Las Marias	PR0020583	05/11	Copper
San Germán PR0020818		05-08/11 06/11, 08/11 05-08/11 05-07/11	Arsenic Color Fecal Coliforms Total Coliforms
Maricao	PR0020648	05/11, 07/11	Undissociated H₂S
San Sebastian (Old)	PR0020851	06/11	pH
Aguadilla	PR0023736	3/12	Fecal Coliforms
Arecibo	PR0023710	09/11	Fecal Coliforms
Fajardo	PR0026484	03/10, 11/10 11/10 06/10, 10/10	Color Fecal Coliforms and Phosphorus Ammonia
Barceloneta	PR0021237	05/11 09/11	Fecal Coliforms, Total Coliforms Sulfide
Guayanilla	PR0020494	06/11-8/11 6/11, 11/11- 1/12, 3/12	Flow Arsenic
Humacao	PR0025399	1/12	pH
Jayuya	PR0022250	6/11-7/11 8/11 3/12 4/12	Phosphorus, Copper Fecal Coliforms, Total Coliforms Fecal Coliforms, Ammonia, Color Chloride
Orocovis	PR0020745	8/11 12/11	Flow Flow, Fecal Coliforms
San Lorenzo	PR0020834	1-2/11 1-4/11	Arsenic Copper
Unibon	PR0024902	2/11	Total Coliforms

		4/11	Total Suspended Solids
Mayaguez	PR0023795	4/10	BOD, Total suspended Solids
Adjuntas	PR0020214	4/10, 5/10, 7/10 8/10	Fecal Coliforms Phosphorus

APPENDIX F

Appendix F Concerning Operation and Maintenance Violations at the WWTPs

Location	Permit No.	Inspection Date	Comments
Aguadilla	# PR 0023736	9/24/12	Severe corrosion affecting various structures and equipment at the WWTP; tanks at plant in need of cleaning; influent wet well and primary clarifiers have high accumulation of solids and debris; a mechanical automatic bar screen out of service.
Aguas Buenas	# PR 002073	6/19/12	Clarifier well and scum collector pit full of sludge and scum; two sludge drying beds full of sludge; not chlorinating proportional to flow at WWTP; and WWTP's discharge point found bypassed due to problem with valves.
Aibonito	# PR 0025461	9/5/12	Secondary clarifier operating with deficiency for several months and two tertiary filters also operating with deficiency; a third tertiary filter out of service since December 2010.
Alturas de Orocovis	# PR 0023001	8/15/12	Solids found in the bar screen and grease at surface of influent chamber; air piping has air leaks at two locations
Arecibo	# PR 0023710	11/30/11	One influent pump out of service for over one year
Barceloneta	# PR 0021237	11/29/11	Influent pumps out of service; grit removal mechanism not operating as intended; secondary clarifier and center well found to have a significant accumulation of foam
Bayamon	# PR 0023728	6/26/12	Clarifier bridge # 1 collapsed and main equipment broken; degreaser tank # 4 found with water leakage through bottom of the tank; and strong wastewater odor at the filter press area
Boqueron (Villa Taina)	# PR 0023442	11/30/12	severe corrosion found affecting various structures and equipment at the WWTP; aeration tanks and channels not being

			properly inspected and maintained; and equipment out of service and not repaired for months (i.e: blowers # 2 and #3)
Borinquen	# PR 0025101	06/26/12	Grit removal paddle drive out of service for several months
Caguas	# PR 0025976	12/2/11	Dissolved oxygen analyzer out of service; influent pump # 4 and mixer # 6 out of service; Tertiary filter #3 out of service; day tank pump # 1 and day tank mixers #1 and #2 out of service
Carolina	# PR 0023752	10/5/12	various equipment (i.e., sludge handling equipment) in need of rehabilitation; nine flood gates out of service; grit removal system shutdown because pumps not operating; sludge pump # 1 and communitor found operating with leakages
Cayey	# PR 0025356	8/16/12	water leaks observed at grit removal mechanisms; following equipment found to be out of service: anoxic pumps, anaerobic mixers, holding mixers, tank nitrate analyzers, flow meter; high concentration of algae found at effluent weirs and at effluent trough channel at clarifiers 1-3
Ciales	# PR 0020427	12/19/11	clarifiers found to have excessive amount of sludge
Comerio	# PR 0026588	2/28/12	Algae growth observed at secondary clarifiers # 1 and # 2 effluent trough channels; Service water pump # 1 and #2 operating with deficiency
Corozal	# PR 0020451	6/4/12	Exit valve of septic receiver tank not operating properly; grit removal units out of service; influent pump # 2 operating poorly; clarifier # 1 found to have significant amount of foam

			and sludge
Guanica	# PR 0020486	5/17/12	Corrosion found at the screw conveyer and collection bin for the screw conveyer; Floatables and scum observed at clarifier surface and center well of clarifier; Leak at a joint of the air piping; solids accumulation observed at digester surface
Guayama	# PR 0025445	10/31/12	Secondary flow measure device not installed; one of the anaerobic digesters out of service and sludge evident on the roof of this unit; rehabilitation necessary at unit # 1 of the primary clarifier
Guayanilla	# PR 0020494	6/7/12	Two degritters out of operation since 2010; sludge observed at surface of primary clarifier and center well of primary and secondary clarifier had grease and sludge; Cat walks and scum pit area corroded; dechlorination unit not operating properly
Isabela	# PR 0022250	8/7/12	Severe corrosion affecting various structures and equipment at the WWTP; inspections and maintenance of aeration tanks and channels are overdue
Jayuya	PR # 0026531	8/29/12	Sludge drying beds need repairs to enhance drying process
Lajas	# PR 0020575	9/25/12	Delays in equipment repairs (i.e.; replacement of UV lamps); inspection and maintenance of treatment units and channels are long overdue; and no cleaning program for pump station's wet well
Mayaguez	# PR 0023795	12/1/11	Influent pump #1 operating with failures; following equipment found to be out of service: degritter pumps, primary clarifier #1, primary effluent pumps #1 and #4, two non-potable pumps; and found too many

			corrective action work orders pending
Orocovis	# PR 0020745	8/15/12	Grease and floatables observed over the surface at the clarifier; clarifier's center well had grease and floatables; sprayer's distribution pipeline broken
Patillas	# PR 20753	12/13/11	Corrosion observed at secondary clarifier; heavy sludge and grease on surface of secondary clarifier; aerobic digesters full and grease and solids
Ponce	# PR 0021563	11/2/12 and 11/5/12	Observed floatables and sludge at surface of clarifier # 2 and #3; housekeeping practices need to be improved
Puerto Nuevo	# PR 0020711	11/22/11	Following equipment found to be out of service: potable water pumps, influent pump #3, sump pump #2, flowmeterr, 8 of the 14 clarifier valves, several chlorine sensors; Several weirs not leveled and allowed short circuiting; clarifiers were observed in poor condition; several process units out of service or under repair
Rio Grandes Estates	# PR 0023264	3/6/12	Clarifier's center wells observed full of scum; observed floatables and sludge cakes rising to surface on both secondary clarifiers; several process units out of service or under repair
San German	# PR 0020818	5/25/12	Long overdue inspections and maintenance of channels and other treatment tanks; severe corrosion is affecting various structures and equipment at WWTP; housekeeping issues found
San Sebastian New	# PR 0025551	9/26/12	Severe corrosion affecting various structures and equipment at WWTP (i.e.: influent pumps discharge pipes); influent infiltration issues found during heavy rains; inspections and maintenance of channels, sedimentation tanks

			and aerobic digestors are long overdue
San Sebastian Old	# PR 0020851	2/8/12	Problems found with operation of the aerobic digester; purple sheen observed at the entrance of stage feeding channel; dried sludge observed on asphalt and not properly contained
Santa Isabela	# PR 0023761	11/16/12	Blower #1 found to have an oil leak; blower #2 out of service
Utuaado	# PR 0026603	9/24/12	WWTP exceeding bacteriology parameters and need to investigate reasons why parameters are being exceeded
Vega Alta	# PR 0020923	6/20/12	Comminutors, vacuum pump # 1 and degritter #2 out of service; wet well contained a significant amount of solid debris and floatables; 17 air diffusers need to be replaced; Sludge digester chambers very full hindering the sludge transferring process and sludge management need to be improved at WWTP; dissolved meter out of service and dissolved oxygen needs to be sampled daily
Vega Baja	# PR 0021679	6/6/12	Mechanical rake and polymer mixer pump operating poorly; calibration of chlorine leak detection past due
Vieques	# PR 0025453	3/12/12	Several process units out of service or under repair
Yabucoa	# PR 0021717	8/21/12	Several process units out of service or under repair
Yauco	# PR 0021661	3/29/ 12	Scum and algae growth observed on surface of anaerobic tank #1 and grease observed in clarifier's center well; no calibration performed for Flow Meter Monitor; housekeeping issues noted re: unidentified containers without containment systems

Naranjito	# PR 207037	11/28/12	Exhaust fan at influent dry pit and sulfur dioxide pump out of service; surface of all three clarifiers had significant amount of foam and sludge cakes over it
Lares	# PR 0025879	3/20/12	Following equipment out of service for some time: influent pump, blower #3, sludge drying beds dewatering system; valve to apply chlorine not operating properly
Toa Alto	# PR 002069	8/20/12	Air diffusers clogged and air leak at air piping; need to address corrosion of clarifier's wall
Penuelas	# PR 0020761	9/13/12	Corrosion observed at the activated sludge package plant; four sluice gates and reactor at activated sludge package plant out of service; centrifugal unit not operating properly; inner baffle of activated sludge package plant full of sludge and solids; sludge and grease observed at surface of the clarifier of activated sludge package plant
Maricao	# PR0020648	12/29/11	Severe corrosion affecting various structures and equipment at WWTP; chlorine not automatically fed proportional to flow; equipment calibration records not available for review
Adjuntas	# PR 0020214	9/7/12	Evidence of corrosion observed at activated sludge package plant; air piping has air leaks; 16 air sprayers clogged and not in operable condition; bar screen for contact stabilization chamber corroded and containing solids; sludge, solids and grease observed at clarifier's center well; grease observed at surface of the chlorine contact chambers; influent and effluent hoses at the auto-samplers were dirty and in need of replacement; housekeeping at the facility premises and the treatment units (activated sludge package plant) needs to be improved
San Lorenzo	# PR 0020834	11/16/12	Several operation units found to be operating

			with deficiencies or out of service for more than one year (i.e., influent pump #1 , communitor #2); scum pump clogged; and housekeeping practices along the clarifiers' area and the entire facility must be improved
Unibon	# PR 0024902	9/17/12	Bi-sulfate pump #1 out of operation and humidity analyzer for total solids out of service; treatment module of old plant and the recirculation boxes and entrance splitter at new plant are highly corroded; dewatering system not working as intended causing sludge drying beds #3 and #4 to be inoperable

APPENDIX G

Appendix G**Pump Station Overflows**

Pump Station	Date of Overflow
Ea Allen Group	9/15/2012
Ea Alturas De Beatriz	11/13/2012
Ea Alturas De Hato Nuevo	2/3/2012
Ea Alturas De San Pedro	10/5/2012
EA Amelia	10/22/2012
Ea Añasco Main	11/19/2012
Ea Arenales	10/2/2012
Ea Avenida Aguadilla	11/7/2012
Ea Bahia	12/4/2012
Ea Barranquitas	4/2/2012
Ea Barros I	12/4/2012
Ea Boquerón	9/2/2012
Ea Borinquen 1	2/22/2012
Ea Borinquen 2	1/17/2012
Ea Brisas De Laurel	2/9/2012
Ea Brisas Del Ceiba	2/8/2012
Ea Brisas Del Mar	10/27/2012
Ea Buena Ventura - Yabucoa	3/5/2012
Ea Buena Vista - Humacao	9/29/2012
Ea Buena Vista - Yabucoa	1/5/2012
Ea Cabo Rojo Main	9/12/2012
Ea Campanillas	9/21/2012
Ea Candelero	4/10/2012
Ea Caracoles	11/7/2012
Ea Cayey Main	9/29/2012
Ea Cedrito	11/20/2012
Ea Ceiba	1/1/2012
Ea Cerro Gordo II	3/26/2012
Ea Ciudad Cristiana	3/26/2012
Ea Clark	4/18/2012
Ea Cofresi	10/29/2012
Ea Colimar	1/26/2012
Ea Comunidad Gonzalez I	10/14/2012
Ea Comunidad Santana	9/28/2012
Ea Conquistador II	9/20/2012
Ea Consolidated	3/5/2012
Ea Consta Esmeralda	2/8/2012
Ea Cruz Rosario	2/4/2012
Ea Domingutto 3	9/15/2012
Ea Dorado Club	1/8/2012
Ea Dos Rios	10/12/2012
Ea Dr. Berríos	9/29/2012
Ea El Baja	1/24/2012
Ea El Cementerio	2/9/2012

Appendix G**Pump Station Overflows**

Ea El Deportivo	11/9/2012
Ea El Pedregal	9/19/2012
Ea El Portón	11/30/2012
Ea El Prado	1/23/2012
Ea El Rio	1/14/2012
Ea El Rosario - San German	9/5/2012
Ea El Rosario - Vega Baja	10/11/2012
Ea Enramada	3/26/2012
Ea Estancias De Juncos	3/28/2012
Ea Ext. El. Valle	11/22/2012
Ea Fajardo	9/18/2012
Ea Fajardo Gardens	10/9/2012
Ea Fomento - Naguabo	4/2/2012
Ea Fuente De Agua Viva	4/8/2012
Ea Girasol	10/15/2012
Ea Guayabal I	9/1/2012
Ea Guerrero 2	1/17/2012
Ea Haciendas De Carraízo	12/28/2012
Ea Hatillo Playa	11/20/2012
Ea Hill Brothers	12/5/2012
Ea Hillside	11/2/2012
Ea Hucars Malecon	1/31/2012
Ea Idamaris Gardens	12/10/2012
Ea Industrial - Las Cuevas	1/30/2012
Ea Industrial - San Lorenzo	11/28/2012
Ea Islote 2	3/3/2012
Ea Jagueyes	11/3/2012
Ea Jaime C. Rodriguez	10/2/2012
Ea Jardín De Este	1/16/2012
Ea Jardines De La Fuente	10/22/2012
Ea Jardines De San Lorenzo	1/10/2012
Ea José Mercado I	3/31/2012
Ea Juan Martín	1/17/2012
Ea Junquito	3/9/2012
Ea La Comuna	12/7/2012
Ea La Garita	9/18/2012
Ea La Máquina I	10/8/2012
Ea La Perla II	11/7/2012
Ea La Ponderosa	10/11/2012
Ea La Prieta	10/11/2012
Ea La Providencia - Patillas	12/9/2012
Ea La Sabana	9/5/2012
Ea La Serrania	3/30/2012
Ea Lares Mills	3/7/2012
Ea Las Americas - Bayamon	2/16/2012
Ea Las Campinas II	2/9/2012

Appendix G**Pump Station Overflows**

Ea Las Carolinas	9/7/2012
Ea Las Casitas	11/12/2012
Ea Las Delicias	11/5/2012
Ea Las Gaviotas Ceiba	12/11/2012
Ea Las Vegas - Catano	1/31/2012
Ea Levittown I	2/28/2012
Ea Lirios Cala	9/29/2012
Ea Lomas Del Sol	9/17/2012
Ea Los Alamos	10/29/2012
Ea Los Almendros	9/24/2012
Ea Maguayo	9/26/2012
Ea Mansiones De Cabo Rojo	11/21/2012
Ea Mansiones De Monte Verde	4/8/2012
Ea Mercedita	9/14/2012
Ea Minillas I	9/10/2012
Ea Minillas II	9/13/2012
Ea Miraflores	2/6/2012
Ea Moca Parque	10/11/2012
Ea Monte Carlo	9/3/2012
Ea Monte Sol - Toa Alta	1/31/2012
Ea Montebello - Trujillo Alto	9/21/2012
Ea Montehiedra II	11/5/2012
Ea Monterrey	10/8/2012
Ea Morovis Pueblo	10/21/2012
Ea Pajuil	4/5/2012
Ea Palmarejo II	10/30/2012
Ea Palmer	9/26/2012
Ea Parcelas Estela	4/6/2012
Ea Placita	10/3/2012
Ea Ponderosa Espinosa	11/13/2012
Ea Ponderosa Y Espinosa	3/10/2012
Ea Portal De La Reina	1/24/2012
Ea Pozo Hondo	9/30/2012
Ea Pueblito Del Rio	10/1/2012
Ea Pueblo Seco	1/30/2012
Ea Puerto Real I	9/23/2012
Ea Puerto Real II	10/19/2012
Ea Punta Santiago	1/11/2012
Ea Quintas De San Luis	3/5/2012
Ea Ramon Rivero Diplo	11/21/2012
Ea Raparto Montellano	11/1/2012
Ea Reo Grande Main	1/25/2012
Ea Reparto Universidad	4/18/2012
Ea Rincon I	11/12/2012
Ea Rio Blanco Heights	10/1/2012
Ea Rio Grande Main	4/1/2012
Ea Rio Sol	10/23/2012

Appendix G**Pump Station Overflows**

Ea Riverview	2/28/2012
Ea Sabalos	11/21/2012
Ea Sabana Del Palmar	11/2/2012
Ea Sabana Eneas	10/25/2012
Ea Sabana Grande	9/18/2012
Ea Salamanca	2/29/2012
Ea San Antonio - Agus Buenas	1/24/2012
Ea San Isidro - Cullebra	1/24/2012
Ea San Joaquin	11/20/2012
Ea San Pedro	1/17/2012
Ea San Tomás	10/26/2012
Ea Santa Barbara	12/22/2012
Ea Santa Clara - San Juan	10/8/2012
Ea Santa Elena 2	1/23/2012
Ea Santa Maria - Ceiba	1/17/2012
Ea Santa Marta	9/4/2012
Ea Santa Rosa	3/21/2012
Ea Santiago Y Lima	1/31/2012
Ea Sub Troncal	1/19/2012
Ea Toa Alta Heights	1/8/2012
Ea Torrecillas IV	3/31/2012
Ea Torrecillas	2/18/2012
Ea Torrecillas II	3/10/2012
Ea Treasure Valley	12/27/2012
Ea UM-49	10/16/2012
Ea URB. Valle San Luis	4/14/2012
Ea Valle Escondido	9/28/2012
Ea Valle Piedras	1/14/2012
Ea Valle San Luis	2/16/2012
Ea Villa Alegria	3/22/2012
Ea Villa Caliz I	12/18/2012
Ea Villa Caliz II	11/14/2012
Ea Villa Carolina Grande	11/2/2012
Ea Villa Del Rey I	11/5/2012
Ea Villa Del Rey IV	1/23/2012
Ea Villa Humacao	11/23/2012
Ea Villa Palmira	9/25/2012
Ea Villa Paraiso	9/12/2012
Ea Villa Pesquera	12/10/2012
Ea Villas De Candelero	10/23/2012
Ea Villas De Castro	1/26/2012
Ea Villas De Rio Grande	2/13/2012
Ea Vista De Isabela	3/15/2012
Ea Vista De Jagueyes	12/26/2012
Ea Vista De Luquillo	12/26/2012
Ea Zona Industrial - Coco-Cola	3/12/2012

Appendix G

Pump Station Overflows

Ea Zona Industrial - Las Piedras	3/1/2012
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